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May 5, 2025

VIA ECF

The Honorable Margaret M. Garnett
United States District Court
Southern District of New York

Re: Jones v. Promenade Group, Inc.
Case No. 1:25-cv-01839-MMG

Dear Judge Garnett:

We represent the plaintiff in the above matter. We write to the Court on behalf of the Defendant to respectfully request an extension of the deadline to respond to Plaintiff's Complaint.

Plaintiff's Complaint was filed on March 5, 2025. See Dkt. 1. Service of process was effectuated on March 12, 2025 See Dkt. 6. Defendant's responsive pleading was due on April 2, 2025. Defendant requests additional time to review the file materials, conduct an investigation and confer with its client in order to draft an appropriate responsive pleading relative to Plaintiff's Complaint. Plaintiff respectfully requests an extension of time through and including June 4, 2025, to respond to Plaintiff's Complaint. This is Plaintiff's first request for such an extension.

There are no pending court dates. Defendant has conferred with Plaintiff regarding this request and Plaintiff has provided its consent.

We thank Your Honor and the Court for its considerations and courtesies.

Respectfully submitted,

STEIN SAKS, PLLC

/s/ Rami Salim

Rami M. Salim, Esq.

cc: Counsel of Record (via ECF notification)

GRANTED. The deadline for Defendant to respond to Plaintiff's Complaint is hereby EXTENDED until **June 4, 2025**. Defendant is advised, however, that it may not proceed in this action without counsel, *see Grace v. Bank Leumi Tr. Co. of NY*, 443 F.3d 180, 192 (2d Cir. 2006) ("[I]t is settled law that a corporation may not appear in a lawsuit against it except through an attorney"), and Plaintiff's counsel may not ethically represent both parties in a lawsuit.

Plaintiff shall serve a copy of this Order on Defendant by first-class mail and/or by in-person service **within two business days from the date of this Order**, and shall file proof of such service **within three business days of the date of this Order**.

SO ORDERED. Dated May 9, 2025.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE